## **QUINN EMANUEL trial lawyers | new york**

295 5th Avenue, New York, New York 10016-7103 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO. **(212) 849-7364** 

WRITER'S EMAIL ADDRESS alexspiro@quinnemanuel.com

December 10, 2024

<u>Via Email and U.S. Mail</u> Torres NYSDChambers@nysd.uscourts.gov

## **Honorable Analisa Torres**

Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: Jane Doe v. Shawn Carter et al., 24-cv-07975-AT

Dear Honorable Judge Torres:

On December 8, 2024, Plaintiff filed an amended complaint naming my client, Shawn Carter, as a defendant in this lawsuit. On December 9, 2024, we filed a motion seeking to have the court decline to permit the Plaintiff in this case to proceed anonymously. As noted in that motion, Plaintiff's attorney Anthony Buzbee has engaged in a campaign to leverage unfounded and heinous allegations against celebrities to secure large settlements. He seeks neither justice nor peace for his victims—he seeks only to benefit himself.

On the afternoon of December 9, 2024, after we had submitted the motion and accompanying exhibits, our offices received outreach via phone call and email from an individual who provided her name to us (though wishes to remain anonymous). Mari Henderson spoke to this woman, who informed Ms. Henderson that she had previously reached out to the Buzbee Law Firm with respect to allegations of trafficking and abuse unrelated to Mr. Combs (or Mr. Carter). The Buzbee firm representatives with whom she spoke asked the woman when she met "Diddy" even though her account did not relate to Mr. Combs at all. Members of the Buzbee firm encouraged this woman to pursue her claims anonymously even though she did not have any interest in doing so. When the woman raised wanting to talk to law enforcement she was informed that it was "not encouraged." After several outreaches, the woman again spoke with members of the Buzbee firm, who she felt were pressing her to make allegations of being drugged, held down, and physically assaulted—allegations that were not true. When the woman declined to adopt the version of events proposed by members of the Buzbee firm, she was summarily dropped as a client. Though the woman provided her identity to Ms. Henderson, she wishes to remain unnamed at this time for fear of retaliation by the Buzbee firm. The information provided by this woman is in the Declaration of Mari Henderson, attached hereto as Exhibit A.

This information, which came to Quinn Emanuel unsolicited, is further evidence in support of Mr. Carter's right to thoroughly investigate, test, and respond to the spurious allegations that have been leveled against him.

We respectfully request that the Court consider this additional information, which was received by Quinn Emanuel only after the filing of yesterday's motion was complete, in connection with the motion to deny the Plaintiff's request to proceed anonymously.

Respectfully Submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Alex Spiro

CC: Antigone Curis